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September 4, 2021

**BY ECF**

Honorable William F. Kuntz  
United States District Judge  
for the Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11202

**Re: U.S. v. Hernandez-Velazquez, et al., 19 Cr. 306 (WFK)**

Dear Judge Kuntz:

I am the attorney for the defendant Arcelia Hernandez-Velazquez in the above-referenced matter; however, I also write on behalf of Ernesto Hernandez-Velazquez, and Hugo Velazquez. A Status Conference is currently scheduled, before Your Honor, for September 10, 2021 at 2:30 P.M.; and the Court has directed that, if the parties have yet to resolve this case short of trial, they are to jointly submit a proposed schedule for pre-trial submissions and trial no later than September 9, 2021.

The parties have been involved in protracted and extremely complex plea negotiations; however, the parties need additional time in which to resolve this matter. Our efforts to resolve the matter have been severely hampered by the limited access that Counsel have had with their incarcerated clients, due to Covid-19 pandemic.

Accordingly, it is respectfully requested that the Court modify the current schedule by continuing the Status Conference to October 26<sup>th</sup>, 27<sup>th</sup>, November 2<sup>nd</sup>, November 3<sup>rd</sup>, or November 4<sup>th</sup> at 11:00 A.M. or later. I have conferred with Assistant United States Attorney Margaret Lee and I understand that the **government has not objection** to this request. Should request is granted by the

Honorable William F. Kuntz, U.S.D.J.  
September 4, 2021

Court, all defendants move to exclude time until the date of the next Status Conference

Your Honor's attention to and consideration of this request are, as always, greatly appreciated.

Respectfully submitted,

*Peter Enrique Quijano*

Peter Enrique Quijano

cc: A.U.S.A. Margaret Lee (by email and ECF)  
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